



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 31, 2015

KEITH A. DAVIS, TREASURER  
NRCC  
320 FIRST STREET, SE  
WASHINGTON, DC 20003

**Response Due Date**  
**05/05/2015**

IDENTIFICATION NUMBER: C00075820

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(f)) and 11 CFR §110.1(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or non-multicandidate political committee in excess of \$32,400 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions were not met within 60 days of

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receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for the refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any refunds should be disclosed on Schedule B supporting 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution or refund the excessive amount will be taken into consideration.

2. Schedule B supporting Line 21(b) of your report discloses a voided or returned check(s) for an expenditure(s) made during this or a previous reporting period. However, you have failed to provide a reason that the check(s) was voided or returned. Please either amend your report to provide an explanation for this activity or clarify if and when this check(s) was reissued. If it was not reissued, please clarify the steps your committee has taken in order to avoid the acceptance of a prohibited in-kind contribution(s). (11 CFR § 104.9)

3. The combined limitation for a National and State Party Committee making coordinated party expenditures on behalf of a House candidate in the State of New York for the 2014 General election is \$94,400. Your reports, however, disclose coordinated party expenditures made on behalf of "CHRISTOPHER PATRICK GIBSON" totaling \$104,175, which appear to exceed the limitations under 52 U.S.C. §30116(d) (formerly 2 U.S.C. §441a(d)) (see attached).

If any apparently excessive expenditure in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

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Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

4. Schedule F supporting Line 25 of your report discloses coordinated expenditures on behalf of "BARBARA J COMSTOCK," "ALEXANDER XAVIER MOONEY," "TORREY WESTROM," and "RYAN ZINKE," which appear to have been made after the general election date. Please be advised that if a service is provided or a communication is aired in one reporting period and the payment is made in a later reporting period, the coordinated expenditure should be reported as a memo entry on Schedule F when the service is provided or the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the coordinated expenditure is made, the report should show a payment on Schedule F and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the coordinated expenditures disclosed after the general election date.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

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Sincerely,

A handwritten signature in black ink, appearing to read "Brian Jones". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Brian Jones  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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**Excessive Contributions and Coordinated Party Expenditures  
NRCC (C00075820)**

**Excessive Contributions from Individuals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
MR. JAMES E. MACDOUGALD	5/19/14	\$10,000.00	2014 June Monthly
MR. JAMES E. MACDOUGALD	10/8/14	\$10,000.00	2014 12 Day Pre-General
MR. JAMES E. MACDOUGALD	10/11/14	\$15,000.00	2014 30 Day Post-General
MR. PAUL SINGER	4/17/14	\$32,400.00	2014 May Monthly
MR. PAUL SINGER	10/20/14	\$32,400.00	2014 30 Day Post-General

**Excessive Coordinated Party Expenditures**

<b>Candidate Supported</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
CHRISTOPHER PATRICK GIBSON	3/4/13	-\$250.00	2013 April Monthly
CHRISTOPHER PATRICK GIBSON	3/4/13	\$250.00	2013 April Monthly
CHRISTOPHER PATRICK GIBSON	10/4/13	\$175.00	2013 November Monthly
CHRISTOPHER PATRICK GIBSON	10/8/14	\$12,000.00	2014 12 Day Pre-General
CHRISTOPHER PATRICK GIBSON	10/10/14	\$89,000.00	2014 12 Day Pre-General
CHRISTOPHER PATRICK GIBSON	10/14/14	\$2,000.00	2014 12 Day Pre-General
CHRISTOPHER PATRICK GIBSON	10/31/14	\$1,000.00	2014 30 Day Post-General